

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

TRACY D. LAMPKIN,)
v.)
Plaintiff)
v.) CIVIL ACTION NO.
UNITED PARCEL SERVICE) 1:06-CV-538-WKW
Defendant.)

**DEFENDANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND
TANGIBLE THINGS**

Defendant, United Parcel Service (“UPS”), hereby requests that Plaintiff Tracy D. Lampkin answer, under oath, the following Requests for Production of Documents and Tangible Things pursuant to Fed. R. Civ. P. 26 and 34, and supplement such answers as required by Fed. R. Civ. P. 26(e).

UPS requests that Plaintiff produce and permit UPS to inspect and copy each of the following documents at the office of UPS's attorneys, Baxley, Dillard, Dauphin, McKnight, & Barclift LLP, 2008 3rd Avenue South, Birmingham, AL 35233, on July 13, 2007 at 10:00 a.m. (unless another mutually agreeable time and location is arranged between the parties). Alternatively, Plaintiff may mail copies of these documents to the undersigned counsel at the law offices of Alston & Bird LLP, 1201 West Peachtree Street, Atlanta, Georgia 30309 on or before July 12, 2007.

DEFINITIONS AND INSTRUCTIONS

See Definitions and Instructions set forth in Defendant's First Interrogatories to Plaintiff.

REQUESTS FOR PRODUCTION

1.

All documents relating to or evidencing each and every communication identified in response to Interrogatory No. 1 of UPS's First Interrogatories to Plaintiff.

2.

All sworn and unsworn declarations, affidavits, depositions, narratives, presentations, assertions, expressions, audio tapes, videotapes, or any other statements received and/or obtained by Plaintiff from any person relating to Plaintiff's employment with UPS or to any of the claims and allegations contained in Plaintiff's EEOC Charge or the Amended Complaint. This request includes, but is not limited to, all documents relating to or evidencing each and every statement made by the persons identified in response to Interrogatory 2 of UPS's First Interrogatories to Plaintiff.

3.

All documents relating to or evidencing any fact known by any of the persons identified in response to Interrogatory No. 3 of UPS's First Interrogatories to Plaintiff.

4.

All documents, including pleadings, motions, deposition transcripts, correspondence, notes, files or other communications relating to or evidencing the lawsuits, charges, complaints, claims, or other actions identified in response to Interrogatory No. 4 of UPS's First Interrogatories to Plaintiff.

5.

All documents relating to, evidencing, or supporting each item of alleged damages identified in response to Interrogatory No. 7 of UPS's First Interrogatories to Plaintiff.

6.

All documents relating to, evidencing, or supporting Plaintiff's allegation that she was discriminated against by UPS on the basis of her race, including, but not limited to, those documents identified in response to Interrogatory 10 of UPS's First Interrogatories to Plaintiff.

7.

All documents relating to, evidencing, or supporting Plaintiff's allegation that she was discriminated against by UPS on the basis of her sex, including, but not limited to, those documents identified in response to Interrogatory 11 of UPS's First Interrogatories to Plaintiff.

8.

All documents relating to, evidencing, or supporting Plaintiff's allegation that she was retaliated against by UPS, including, but not limited to, those documents identified in response to Interrogatory 12 of UPS's First Interrogatories to Plaintiff.

9.

All documents relating to, evidencing, or supporting Plaintiff's allegation that she was paid less than male employees in violation of the Equal Pay Act, including, but not limited to, those documents identified in response to Interrogatory 13 of UPS's First Interrogatories to Plaintiff.

10.

All other documents relating to, evidencing, or supporting the allegations and claims contained in Plaintiff's EEOC Charge or the Amended Complaint, including, but not limited to all documents identified in response to Interrogatory 14 of UPS's First Interrogatories to Plaintiff.

11.

All documents relating to or evidencing each and every physical or mental treatment, condition, injury or illness identified in response to Interrogatory 15 of UPS's First Interrogatories to Plaintiff.

12.

All documents relating to or evidencing any communication identified in response to Interrogatory 18 of UPS's First Interrogatories to Plaintiff.

13.

All documents, including, but not limited to, notes, tapes, records, journals, or diaries, which Plaintiff prepared or maintained at any time and which relate to any of the claims and allegations contained in Plaintiff's Complaint.

14.

All documents constituting or evidencing contracts, fee agreements, or fee and expense arrangements between or among Plaintiff and his attorney or any attorney, person or entity having a financial interest in this litigation.

Served this 13th day of June, 2007.



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Attorneys for Defendants

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CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the within and foregoing DEFENDANT'S FRIST REQUEST FOR PRODUCTION OF DOCUMENTS AND TANGIBLE THINGS by United States Mail with adequate first class postage affixed thereon, addressed as follows:

Crystal M. James
8451 S. Cherokee Blvd.
Suite F
Douglasville, GA 30134

This 13th day of June, 2007.

Matthew Cook

Mark T. DeLoach
Georgia Bar No. 141880
ALSTON & BIRD LLP
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